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and all others similarly situated*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

Richard Klein and Raymond Urias, individually and  
on behalf of all others similarly situated,

Plaintiffs,

-vs.-

National Collegiate Student Loan Trust AKA  
National Collegiate Master Student Loan Trust I;  
National Collegiate Student Loan Trust 2003-1;  
National Collegiate Student Loan Trust 2004-1;  
National Collegiate Student Loan Trust 2004-2;  
National Collegiate Student Loan Trust 2005-1;  
National Collegiate Student Loan Trust 2005-2;  
National Collegiate Student Loan Trust 2005-3;  
National Collegiate Student Loan Trust 2006-1;  
National Collegiate Student Loan Trust 2006-2;  
National Collegiate Student Loan Trust 2006-3;  
National Collegiate Student Loan Trust 2006-4;  
National Collegiate Student Loan Trust 2007-1;  
National Collegiate Student Loan Trust 2007-2;  
National Collegiate Student Loan Trust 2007-3;  
National Collegiate Student Loan Trust 2007-4;.

Defendant.

CASE NO:2:22-cv-01392-GMN-BNW

**CLASS ACTION**

**STIPULATION AND ORDER FOR  
EXTENDING TIME FOR PLAINTIFFS'  
TO RESPOND TO DEFENDANTS'  
MOTION TO DISMISS**

Pursuant to Local Rules IA 6-1 and 7-1, Plaintiffs, Richard Klein and Raymond  
Urias ("Plaintiffs") and National Collegiate Student Loan Trust et al ("Defendants"), by and

1 through their Respective counsel of record, hereby stipulate, agree and respectfully request that  
 2 the Court extend the deadline for the Plaintiffs to file their amended complaint to Defendant's  
 3 Motion to Dismiss from November 30, 2022, to December 23, 2022. Counsel for Plaintiffs  
 4 respectfully request time in light of their current schedule and the complexity of the matter. The  
 5 parties have agreed that neither will seek to commence any discovery until, at the earliest,  
 6 Defendants file their response to the Amended Complaint in a manner consistent with LR 26-1.  
 7 The parties nevertheless reserve their rights to oppose the commencement of discovery, on  
 8 grounds that it is premature or otherwise improper, including without limitation by seeking an  
 9 order staying discovery pursuant to Fed. R. Civ P. 26. The parties also reserve their rights to  
 10 request a lengthier discovery period than the one stated in LR 26-1.  
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 12

13 Dated: November 21, 2022

14 FREEDOM LAW FIRM

15 /s/ George Haines

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Dated November 21, 2022

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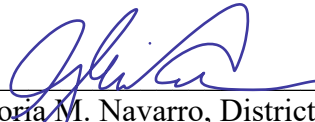
6 \*to motion for appearance *pro hac vice*  
7 *Attorneys for Plaintiffs and the Proposed*  
8 *Class Attorneys for Plaintiff and on behalf of*  
9 *all others similarly situated*

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*Attorneys for Defendants*

10 **ORDER**

11 **IT IS SO ORDERED.**

12 Dated this 29 day of November, 2022.

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16 Gloria M. Navarro, District Judge  
17 UNITED STATES DISTRICT COURT  
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